



May 16, 1995

Mr. Paul R. Counterman, P.E., Chief
Bureau of Western Hazardous Waste Programs
Division of Hazardous Substances Regulation
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233-0001

Re: Resource Conservation and Recovery Act (RCRA)
Corrective Action Program
NY Permit Number 90-86-0707
Buffalo Avenue Plant

- Overburden Groundwater Remediation
 - Corrective Measures Study Supplemental Plan
- Bedrock Groundwater Remediation - Extraction Well Pumping Tests
- A-Well NAPL Pumping

Dear Mr. Counterman:

OxyChem is in receipt of your recent letters regarding the reports entitled:

- "Corrective Measures Study, Overburden Groundwater Remediation - Supplemental Plan", received March 30, 1995;
- "Corrective Measures Implementation, Bedrock Groundwater Remediation - Extraction Well Pumping Test Program", received April 6, 1995; and
- "Interim Corrective Measure, NAPL in Bedrock", received March 27, 1995.

OxyChem's responses to the State letters are presented below.

Overburden Groundwater Remediation - Corrective Measures Study Supplemental Plan

1. The State requested that the discharge from the Energy Boulevard Storm Sewer be analyzed for Target Compound List (TCL) parameters and dioxin.

OxyChem performs an annual SPDES monitoring event on the Energy Boulevard Storm Sewer. The annual event monitors the discharge for volatile organic compounds, base/neutral extractables, metals, pesticides, polychlorinated biphenyls and 2,3,7,8-TCDD. The 1993 and 1994 annual monitoring data were not included in OxyChem's January 30, 1995 response letter. The results are presented in the attached Tables 1 and 2, respectively.

The results shown in the attached tables confirm the very low chemical concentrations and loadings in the Energy Boulevard Storm Sewer presented in the



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Occidental Chemical Center

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January 30, 1995 response letter. The parameters monitored during the annual SPDES event include the majority of parameters requested by the State including dioxin. Therefore, OxyChem believes that additional sampling of the Energy Boulevard Storm Sewer is not necessary.

2. OxyChem will submit the 30 percent design report for Flow Zone 1 remediation by May 31, 1995.

Bedrock Groundwater Remediation - Extraction Well Pumping Tests

1. Presented on the attached Plan 1 are the surveyed locations of the bedrock groundwater extraction and monitoring wells. The top of casing/flange elevations for the above wells are presented in Table 3.
2. OxyChem will obtain monitoring data from the NYPA to evaluate fluctuations in the potentiometric surface of the NYPA Conduit drain system. OxyChem will also monitor the operation of the EFW basement groundwater collection system to the extent practicable during the pumping tests of extraction wells BEW705 and BEW706.
3. The flow meters used during the pumping tests are calibrated by the manufacturer and consequently do not require manual calibration. Given the flow rates anticipated to be produced by some of the wells (80 gpm), it would be extremely difficult to perform a manual calibration in the field. OxyChem will compare the flow rates from the pumping tests to the effluent flow rate from the U-Area treatment system to the degree possible as an approximate check of calibration.

A-Well NAPL Pumping

1. OxyChem will check all Supplemental Data Collection Program (SDCP) A-wells for the presence of NAPL on an annual basis. If NAPL is observed in an A-Well, then OxyChem will notify State and initiate a NAPL collection program.
2. The A-Well NAPL collection program did not commence until April 18, 1995 due to damage of OW402A by construction activities. Well OW402A was subsequently repaired and the NAPL collection event was completed on April 24, 1995. The State on-Site monitors were notified of the delays that occurred during this collection event.
3. The first annual supplemental report will be submitted by April 30, 1996.

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Please call me at 716-286-3607 if you have any questions or comments regarding this submission.

Yours truly,



for Alan F. Weston, Ph.D.
Manager, Analytical Services
Special Environmental Programs

AFW/csm/27

c.c. K. Maiurano
D. Munro
F. Shattuck
T. Robinson
W. Wertz
A. Bellina (2)

TABLE 3
EXTRACTION AND MONITORING WELL ELEVATIONS

<i>Well No.</i>	<i>Top of Casing/Flange Elevation (1) (ft. AMSL)</i>
BEW700B	565.35
BEW701B	566.24
BEW701C	566.37
BEW701D	565.73
BEW702D	569.20
BEW702C	568.95
BEW702B	568.90
BEW703D	569.96
BEW703B	569.57
BEW703C	569.09
BEW704D	570.39
BEW704B	569.51
BEW704C	569.37
BEW705B	570.77
BEW705C	570.17
BEW705D	570.28
BEW706B	569.70
BEW706D	569.57
BEW706C	569.09

TABLE 3
EXTRACTION AND MONITORING WELL ELEVATIONS

<i>Well No.</i>	<i>Top of Casing/Flange Elevation (1) (ft. AMSL)</i>
OW660B	579.47
OW661D	568.93
OW661C	568.92
OW661B	568.67
OW662B	569.79
OW662C	569.74
OW662D	569.91
OW663D	572.23
OW663C	572.00
OW663B	571.81
OW664D	571.57
OW664B	571.55
OW664C	571.52
OW665D	573.13
OW665B	573.04
OW665C	573.11
OW666D	571.18
OW666B	571.39
OW666C	571.32
OW667 D	(2)
OW667 B	573.06
OW667 C	572.48
OW668B	570.84
OW668C	571.00
OW668D	571.15

Note:

- (1) Reference elevation point for extraction wells is the flange sample port.
- (2) Well damaged during construction activities. Top of casing elevation will be surveyed following repair of the well.

